

July 16, 2006

RE: Business Opportunity Rule, R511993

Below is a brief description of how the Business Opportunity Rule, R511993 will have a negative impact on my business.

First, the most devastating impact upon my business would be the suggested seven day waiting period. This waiting period is extremely inconvenient for my potential purchaser. Not to mention it will create a sense of anxiety and suspicion among my potential customer that this business is a pyramid or a scam. Which we all know that direct selling is a legitimate business with huge monetary and personal benefits when worked and managed appropriately. XanGo is an incredible company with an outstanding product that has greatly improved my health. The product which we market has improved not only my health but my family and friends health as well. To inflict this seven day waiting period upon any direct selling business whether it is mine or the other thousands of people who operate such a business would be inconceivable.

The next negative impact on my XanGo business would be the requirement to disclose 10 of my nearest references of prospective purchasers. When I apply for a regular sales position within a corporation I am required to give 3 references. In some cases they are personal references in others they are professional references. Never in my 25 years of working in the United States of America have I been required to submit to an employer more than 3 references let alone a list of potential customers that I am going to pursue if I become a sales representative for XYZ Corporation. Why would I be required to submit 10 potential customers information as references? In many situations I will be marketing my business through various avenues of advertising, referrals, etc., and may not know where a prospective purchaser lives before meeting him/her. Requiring 10 references is burdensome and extremely excessive. In addition, this is not required of me if I were to apply for a regular sales position within a corporation. Why would I be required to do so by owning my own home based direct selling business?

If I am required to generate this reference list it will also impede the seven day waiting period. Causing more frustration for the purchaser and I could potentially lose the sell. From a privacy perspective, I would have to disclose my own home address and those of my purchasers therefore, any interested party would have this information at their fingertips. I would not want to participate in this type of system for fear of those who are out there that are in a fraudulent business and would gain access to my personal information and potential customers.

The proposed rule requiring complex compilations of statistical matrices of time frames, and demographic data and earning claims is another unwarranted piece of the rule to impose on direct selling business owners. I agree that earning claims are necessary but to require such complex and statistical data is burdensome and very difficult. Especially, when some people, such as myself, utilize direct selling businesses to supplement their incomes. I also feel that those companies out there that aren't legitimate will not provide accurate data and those of us who are hard working, integrity driven American workers will have difficulty meeting the suggested requirements.

Finally, implementing the cancellation and refund portion of this new rule would be totally unnecessary. People will get into direct selling and network marketing for various reasons. Some will want to pay off debt and only participate for six months to a year to achieve that goal. My own personal testimony of such a scenario is as follows: I joined another direct selling company just 6 years ago. Why? Because I wanted to supplement my income and I wanted to save \$10,000 for my wedding day! I was with the other direct selling company for about 15 months and in 9 of those months I made my money for my wedding and in addition supplemented my income then got out! This had nothing to do with my dissatisfaction of the company or their products and services!

Thank you.

S. Moore